

**BEFORE THE POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001**

**Mail Processing Network
Rationalization Service Changes, 2012**

Docket No. N2012-1

**INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS OF THE NATIONAL ASSOCIATION OF PRESORT MAILERS
TO UNITED STATES POSTAL SERVICE WITNESS CHERYL MARTIN
(NAPM/USPS-T6-1-4)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the National Association of Presort Mailers (NAPM) directs the following interrogatories and requests for production of documents to United States Postal Service Witness Cheryl Martin. If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

_____/s/
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DATED: February 17, 2012

NAPM/USPS-T6-1. Please refer to page 5 where you discuss the AMP studies and how “[e]ach will require its own evaluation of available transportation, how such transportation should be adjusted, and any consequent increases or decreases in transportation costs.”

- a. Please confirm that the transportation to and from mailer facilities (DMUs, Plant Loads, etc...) was considered during this process. If confirmed, please provide a detailed explanation of the data used to determine the amount of volume being currently transported from these locations.
- b. Please provide the results from PIR analysis of previous facility closures regarding cost and service impacts to mailers and mail service providers who were affected by transportation changes.

NAPM/USPS-T6-2. Please refer to page 6 of your testimony where you discuss the transportation network between origin and destination processing plants.

- a. For each pair of originating and destinating processing plants in the current network please provide the total volume of First-Class Automation Letter Mail volume that is moved via the air transportation.
- b. For each pair of originating and destinating processing plants in the current network please provide the total volume of First-Class Automation Letter Mail volume that is moved via surface transportation.
- c. For each pair of originating and destinating processing plants in the current network please provide the total volume of First-Class Automation Letter Mail volume that is moved via other transportation modes.

- d. For each pair of originating and destinating processing plants following the proposed network rationalization please provide the estimated total volume of First-Class Automation Letter Mail volume that will be moved via the air transportation.
- e. For each pair of originating and destinating processing plants following the proposed network rationalization please provide the estimated total volume of First-Class Automation Letter Mail volume that will be moved via surface transportation.
- f. For each pair of originating and destinating processing plants following the proposed network rationalization please provide the estimated total volume of First-Class Automation Letter Mail volume that will be moved via other transportation modes.

NAPM/USPS-T6-3. Please refer to page 7 where you discuss being “[a]ble to reduce the number of plant-to-plant links in the transportation network so that there is only one plant-to-plant link between the remaining two network nodes”

- a. Please confirm whether the reduction in the number of plant-to-plant links is focused exclusively on the network between Postal Service facilities. If not confirmed, please provide a detailed description of the transportation nodes between mailer and mail service provider facilities and the Postal Service plant included in your new network?

NAPM/USPS-T6-4. Please refer to page 12 of your testimony where you discuss being able to, “[c]reate new opportunities for the Postal Service to transport such mail to delivery units and transport collection mail to the processing plant in combined trips, as opposed to separate trips, thereby improving the efficiency of the plant-to-Post Office network.”

- a. Please confirm whether under the proposed network rationalization plan mail ready for delivery will be dropped at the delivery office and the collection mail will be picked up in a single transportation run. If confirmed, please provide a detailed explanation as to when the Postal Service plans to pick up collection mail (i.e., in the early evening as you do today or rather picking it up in the middle of the night or early morning when you drop the delivery mail). If not confirmed, please explain fully.
- b. Please confirm whether the mail cancellation process will remain as it is today. If confirmed, please provide a detailed explanation as to how your transportation network will pick up collection mail and drop carrier ready mail. Will you pick up mail and drop delivery ready mail in late afternoon and early evening? Will you pick up mail and drop delivery ready mail early in the morning?
- c. Please confirm whether the new network will require current DOV (dispatch of value) times to be moved to an earlier time. If confirmed please provide a detailed explanation of how the change in DOV times will this impact the CAT for customers entering commercial mailings. Please also identify locations that will have their CATs moved earlier. If not confirmed, please explain fully.